

Response to AKART Analysis

1. OK. Permit will include an effluent limit based on meeting water quality criteria at the end of the pipe. There is no change to the limit in the draft permit. In response to Bruce's discussion, CPO are measured by methods for total residual chlorine. (page 1 of 1984 Ambient Water Criteria for Chlorine). The compliance evaluation limits may be higher than the criteria, but that doesn't prevent having a limit in the permit.
2. OK
3. OK
4. a. OK
b. Permit requires monitoring of dry dock. Add non-storm water monitoring? Permit needs to have monitoring of copper in the dry dock discharge. If the dry dock discharge exceeds 63.7 ug/L, they need to evaluate treatment.
c. no comment
d. no comment. Is Jeanne satisfied with this response?
e. Permit requires monitoring of dry dock. Add non-storm water monitoring?
f. no comment

Can they do inlet sampling at the dry dock outfalls? Are there any high risk areas that discharge to Puget Sound?

5. Piers – No comment?
6. The scale on the expanded graph is 0 to 500 ug/L. The NPDES permit is concerned with low level of copper. It appears there is little correlation between turbidity and copper in the lower range. Please show the expanded graph at the lower turbidity range at a maximum 100 ug/L of copper and provide the correlation data for just this subset of data. Data in enclosure 1 supports this.
6.b No comment
6.c Once PSNS reaches the daily limit of amount of flow that can be sent to the sewer, sending any excess may not be protective. Did they look at the option to send to storage the flow? They need to treat the stormwater that exceeds the capacity of the stormwater system.
6.d Did they define the areas for collection of stormwater. i.e. what are the most contaminated.
7. 7.a No comment
7.b No comment
7.c No comment
7.d No comment
7.e No comment
7.f No comment
7.g No comment
8. Is Jeanne fine with that?
9. The permit will require that cooling water be routed to the drainage system prior to the start of industrial work.

10. Ask Misha – Is pavement wash water inconsistent with the MSGP. Put in permit – they cannot wash areas of burning, cutting, etc. into the stormwater drain.
11. Add to permit - All metal work areas must be constructed to prevent contact with work process and/or debris.
12. OK
13. OK
14. Add. “Enclose all anti-fouling spray painting operations.
15. OK
16. Check Zones 1 through 6 in Section 14. Do they address these high risk areas separately? This corresponds to Option 2 – what does Jeanne think about this?